

1 KELLER BENVENUTTI KIM LLP

2 Tobias S. Keller (#151445)

3 (tkeller@kbkllp.com)

4 Peter J. Benvenutti (#60566)

5 (pbenvenutti@kbkllp.com)

6 Jane Kim (#298192)

7 (jkim@kbkllp.com)

8 650 California Street, Suite 1900

9 San Francisco, CA 94108

10 Tel: 415 496 6723

11 Fax: 650 636 9251

12 *Attorneys for Debtors and Reorganized Debtors*

13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED
DEBTORS' TWENTY-FIRST OMNIBUS
OBJECTION TO CLAIMS (BOOKS AND
RECORDS CLAIMS)**

Response Deadline:
November 3, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: November 17, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation
2 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as
3 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
4 (the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

5 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on
6 **November 17, 2020, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Fourth*
7 *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, **all hearings**
8 **through March 1, 2021 will be held by video or teleconference. The courtroom will be closed.**
All parties who wish to appear at the Omnibus Hearing must make arrangements to appear
9 telephonically with CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day
before the Omnibus Hearing. Further information regarding telephonic appearances via CourtCall can
10 be found on the Bankruptcy Court’s website, at the following location: www.canb.uscourts.gov >
Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone.
Charges have been waived by CourtCall for pro se parties.

11 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the
12 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Twenty-First*
13 *Omnibus Objection to Claims (Books and Records Claims)*, filed on October 8, 2020 [Dkt. No. 9272]
(the “**Omnibus Objection**”).

14 **PLEASE TAKE FURTHER NOTICE** that any oppositions or responses to the Omnibus
15 Objection must be in writing, filed with the Bankruptcy Court, and served on counsel for the
16 Reorganized Debtors at the above-referenced address or by email at PGEclaims@kbkllp.com so as to
be received by no later than **4:00 p.m. (Pacific Time) on November 3, 2020**. Any oppositions or
17 responses must be filed and served as described in the *Order Approving (A) Procedures for Filing*
Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections,
18 entered on July 1, 2020 [Dkt No. 8228] (the “**Omnibus Objections Procedures Order**”). **Any relief**
requested in the Omnibus Objection may be granted without a hearing if no opposition is timely
filed and served in accordance with the Omnibus Objections Procedures Order. In deciding the
19 Omnibus Objection, the Court may consider any other document filed in these Chapter 11 Cases and
related Adversary Proceedings.

20 **PLEASE TAKE FURTHER NOTICE** that a customized Twenty-First Omnibus Claim
21 Objection Notice in substantially the form attached hereto as **Exhibit A** has been sent to each of the
22 parties to whose Proof(s) of Claim the Reorganized Debtors objected in the Omnibus Objection.

23 **PLEASE TAKE FURTHER NOTICE** that copies of the Omnibus Objection and its
supporting papers can be viewed and/or obtained: (i) by accessing the Court’s website at
24 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450 Golden
Gate Avenue, San Francisco, CA 94102, or (iii) from the Reorganized Debtors’ notice and claims
25 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll
free) for U.S.-based parties; or +1 (929) 333-8977 for International parties or by e-mail at:
26 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
Bankruptcy Court’s website.

1 Dated: October 8, 2020

KELLER BENVENUTTI KIM LLP

2 /s/ Peter J. Benvenutti

3 Peter J. Benvenutti

4 *Attorneys for Debtors and Reorganized Debtors*

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit A
Twenty-First Omnibus Claim Objection Notice

1 KELLER BENVENUTTI KIM LLP

2 Tobias S. Keller (#151445)

3 (tkeller@kbbkllp.com)

4 Peter J. Benvenutti (#60566)

5 (pbenvenutti@kbbkllp.com)

6 Jane Kim (#298192)

7 (jkim@kbbkllp.com)

8 650 California Street, Suite 1900

9 San Francisco, CA 94108

10 Tel: 415 496 6723

11 Fax: 650 636 9251

12 *Attorneys for Debtors and Reorganized Debtors*

THE OBJECTION DESCRIBED IN THIS NOTICE ASKS THE COURT TO REDUCE YOUR CLAIM(S) IDENTIFIED AS "OBJECTED-TO" ON THE FOLLOWING PAGE OF THIS NOTICE.

CLAIMANTS RECEIVING THIS NOTICE SHOULD READ THIS NOTICE CAREFULLY BECAUSE THE OBJECTION MAY AFFECT YOUR RIGHT TO RECEIVE A DISTRIBUTION ON YOUR CLAIM IN THIS CASE.

IF YOU HAVE QUESTIONS, PLEASE CONTACT PRIME CLERK, LLC, AT (844) 339-4217

THE LAST PARAGRAPH OF THIS NOTICE EXPLAINS HOW YOU CAN OBTAIN A COMPLETE COPY OF THE OBJECTION, AT NO COST TO YOU.

13
14 **UNITED STATES BANKRUPTCY COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 **In re:**

18 **PG&E CORPORATION,**

19 **- and -**

20 **PACIFIC GAS AND ELECTRIC**
21 **COMPANY,**

22 **Debtors.**

- 23 ☐ Affects PG&E Corporation
24 ☐ Affects Pacific Gas and Electric Company
25 ☒ Affects both Debtors

26 ** All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

NOTICE OF THE REORGANIZED DEBTORS' TWENTY-FIRST OMNIBUS OBJECTION TO CLAIMS (BOOKS AND RECORDS CLAIMS)

Response Deadline:
November 3, 2020, 4:00 p.m. (PT)

Hearing Information If Timely Response Made:

Date: November 17, 2020

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

[Claimant Name]

Objected-To Claim(s)					Reduced Amount
Date	Claim #	Debtor	Classification	Amount	

On October 8, 2020, PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors (collectively, the “**Debtors**,” or as reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), filed their *Twenty-First Omnibus Objection to Claims (Books and Records Claims)* (the “**Omnibus Objection**”) with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”). A full copy of the Omnibus Objection may be obtained at no cost, as provided below.

Any Response (as defined below) to the Omnibus Objection must be filed and served upon the Reorganized Debtors’ Counsel by November 3, 2020 (the “Response Deadline”);

Any Response must be accompanied by any declarations or memoranda of law any responding party wishes to present in support of its position;

If there is no timely Response, the Bankruptcy Court may enter an order granting the Omnibus Objection to your Proof(s) of Claim by default.

If you file a timely Response, the Hearing will be held at the date and time shown below. If factual disputes are presented by the Objection and the Response, the Hearing will proceed as a status conference; factual disputes will not be decided at the Hearing, but at a future evidentiary hearing that may be set at the Hearing. Issues of a purely legal nature, where facts are not in dispute, may be decided at the Hearing. See Bankruptcy Local Rule 3007-1.

If you file and serve a timely Response, the date, location and time of the Hearing are:

November 17, 2020 at 10:00 a.m. (Pacific Time)

Courtroom 17, 16th Floor, 450 Golden Gate Ave., San Francisco, CA

The Hearing will be held before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Fourth Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, **all hearings through March 1, 2021 will be held by video or teleconference. The courtroom will be closed.** All parties who wish to appear at the Omnibus Hearing must make arrangements to appear telephonically with CourtCall at 1-866-582-6878 no later than 4:00 p.m. (Pacific Time) on the day before the Omnibus Hearing. Further information regarding telephonic appearances via CourtCall can be found on the Bankruptcy Court’s website, at the following location: www.canb.uscourts.gov > Rules and Procedures > District Procedures > Policy and Procedure for Appearances by Telephone. Charges have been waived by CourtCall for pro se parties. Reorganized Debtors’ Counsel will, as a courtesy and on request, provide by email to those who have filed timely Responses updated information regarding how to attend.

1 **These Omnibus Claims Objection Procedures DO NOT APPLY to any proofs of claim**
2 **with respect to (a) FIRE VICTIM CLAIMS or (b) SUBROGATION WILDFIRE CLAIMS.**

3 **BASIS FOR OBJECTION TO YOUR PROOF(S) OF CLAIM:** By the Omnibus
4 Objection, the Reorganized Debtors seek to reduce the amount of one or more of your Proof(s) of
5 Claim (as defined therein) listed above as “Objected-To Claim(s)” on the grounds that the amount(s)
6 sought in the designated Proof(s) of Claim exceeds the amount reflected in the Reorganized Debtors’
7 books and records. If you do **NOT** oppose the reduction of your Objected-To Proof(s) of Claim listed
8 above, then you do NOT need to file a written Response to this Omnibus Objection and you do NOT
9 need to appear at the Hearing. If you do nothing, the Objected-To Claim(s) will be allowed in the
10 amount listed in the “Reduced Amount” column above.

11 **FILING AND SERVICE OF RESPONSE:** If you **DO** oppose the reduction of your
12 Objected-To Proof(s) of Claim listed above, then you **MUST** file a response (a “**Response**”), in
13 writing, with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at
14 PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on November**
15 **3, 2020 (the “Response Deadline”):** You must file the Response through the Court’s electronic case
16 filing (“ECF”) system if you have access to the ECF system; service on the Reorganized Debtors’
17 Counsel will occur automatically upon ECF filing; and no separate service of your Response is
18 required. If you do NOT have access to the ECF system, service must be made by electronic mail to
19 the email addresses of the Reorganized Debtors’ counsel as shown on the Objection, and you must
20 arrange for the Response to be filed with the Court within two business days thereafter. If you do not
21 have the ability to serve a Response electronically, the Response must be served by mail, express or
22 some other means so either (a) it is actually received by the Reorganized Debtors’ Counsel by the
23 Response Deadline, or (b) it is dispatched not later than the Response Deadline through a postal or
24 commercial express service that will make actual delivery not more than two business days after the
25 Response Deadline, and in that case the Claimant must inform the Reorganized Debtors’ counsel by
26 email, telephone or facsimile before the Response Deadline of the Claimant’s name and phone number,
27 the number of the Omnibus Objection, and the fact that a paper Response is being delivered by
28 express.

1 **CONTENTS OF RESPONSE** The Response must, at a minimum, include the following:
2 (i) a caption setting forth the name of the Bankruptcy Court, the name of the Reorganized Debtor, the
3 case number and title of the Omnibus Objection to which the Response is directed; (ii) your name, the
4 assigned number(s) of your Proof(s) of Claim, and an explanation for the amount of the Proof(s) of
5 Claim; (iii) a concise statement setting forth the reasons why the Bankruptcy Court should not sustain
6 the Omnibus Objection; (iv) a declaration under penalty of perjury of a person with personal
7 knowledge of the relevant facts that support the Response; (v) your name, address, telephone number,
8 and/or the name, address, and telephone number of your attorney and/or designated representative to
9 whom counsel for the Reorganized Debtors should serve a reply to the Response, if any; and (vii) the
10 name, address, telephone number, and email address of the party with authority to reconcile, settle, or
11 otherwise resolve the Omnibus Objection on your behalf, if any.

12 If the Bankruptcy Court does not reduce your Objected-To Proof(s) of Claim listed above, then
13 the Reorganized Debtors have the right to object on other grounds to your Proof(s) of Claim at a later
14 date. You will receive a separate notice of any such objection.

15 **TO GET COPIES OF THE COMPLETE OBJECTION:** Copies of the complete Omnibus
16 Objection and the other pleadings and documents identified herein can be viewed and/or obtained:
17 (i) by accessing the Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account
18 required], (ii) for free by download from on the Reorganized Debtors’ approved notice and claim

1 agent's website at <https://restructuring.primeclerk.com/pge/Home-DocketInfo>, or (iii) by mail, for free,
2 by calling Prime Clerk LLC at (844) 339-4217 (Toll Free) or by email at pgeinfo@primeclerk.com to
3 request a complete copy of the Omnibus Objection, including all Exhibits.

4 Dated: October 8, 2020

KELLER BENVENUTTI KIM LLP

/s/ Peter J. Benvenutti

Peter J. Benvenutti

Attorneys for Debtors and Reorganized Debtors